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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

CHARLES ASBERGER,

Plaintiff,

v.

CAROLYN W. COLVIN,  
Acting Commissioner of Social Security,

Defendant.

Case No. 2:14-cv-01209-RFB-PAL

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME  
(SECOND REQUEST)**

Defendant Carolyn W. Colvin, Acting Commissioner of Social Security ("Defendant") respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm by 30 days from April 1, 2015, to and including May 1, 2015.

Defendant respectfully requests this extension due to a heavy workload, including several other district court cases, despite due diligence, and because Defendant was out of the office for several days. Defendant therefore needs additional time to prepare a response in this matter and properly address the

1 issues Plaintiff raises in his motion. This request is made in good faith with no intention to unduly delay  
2 the proceedings. This is Defendant's second request for an extension.

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4 On April 1, 2015, Counsel for Defendant conferred with Plaintiff's counsel who had no objection  
5 to this motion.

6 Defendant sincerely apologizes to the Court for any inconvenience caused by this delay.

7 Respectfully submitted this 1<sup>st</sup> day of April 2015.

8 DANIEL G. BOGDEN  
9 United States Attorney

10 /s/ Lynn M. Harada  
11 LYNN M. HARADA  
12 Special Assistant United States Attorney

13 OF COUNSEL:

14 DONNA L. CALVERT  
15 Regional Chief Counsel, Region IX

16  
17 IT IS SO ORDERED:

18   
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: April 7, 2015  
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**CERTIFICATE OF SERVICE**

I, **LYNN M. HARADA**, certify that the following individual was served with a copy of the **UNOPPOSED MOTION FOR EXTENSION OF TIME (SECOND REQUEST)** on the date and via the method of service identified below:

**CM/ECF:**

Marc V. Kalagian  
Rohlfing & Kalagian, LLP  
211 E. Ocean Blvd., Suite 420  
Long Beach, CA 90802  
Marc.Kalagian@rksslaw.com

Dated this 1<sup>st</sup> day of April 2015.

/s/ Lynn M. Harada  
**LYNN M. HARADA**  
Special Assistant United States Attorney